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14 Attorneys for Defendants
15 COUNTY OF SAN JOAQUIN,
DAVID KWONG, and JUANITA M. HUERTA

16 UNITED STATES DISTRICT COURT

17 EASTERN DISTRICT OF CALIFORNIA

18 SACRAMENTO DIVISION

19 HOFFMAN BROS. HARVESTING, INC., et al.,

Case No. 2:20-cv-00660-TLN-AC

20 Plaintiffs,

**JOINT STIPULATION TO CONTINUE
HEARING ON MOTION TO DISMISS;
ORDER**

21 vs.

22 COUNTY OF SAN JOAQUIN, et al.,

23 Defendants.

24 Pursuant to E.D. Cal. L.R. 230(f), the parties—Plaintiffs Hoffman Brothers Harvesting, Inc., Paul
25 D. Hoffman & Sons, Ronald E. Hoffman, and Carl R. Hoffman (collectively, “Plaintiffs”) and
26 Defendants County of San Joaquin, David Kwong, and Juanita M. Huerta (collectively, “Defendants”)—
submit the following joint stipulation to continue the hearing date on Defendants’ pending motion to
27 dismiss (ECF No. 6).

STIPULATION

WHEREAS, Defendants' pending motion to dismiss was originally noticed and scheduled for hearing on July 23, 2020 (ECF No. 6);

WHEREAS, the parties jointly stipulated to continue the hearing to September 17, 2020 (ECF No. 8), and the Court granted the stipulation (ECF No. 9);

WHEREAS, the parties jointly stipulated to further continue the hearing to November 12, 2020 (ECF No. 10), and the Court granted the stipulation (ECF No. 11);

WHEREAS, the parties jointly stipulated to further continue the hearing to January 21, 2021 (ECF No. 12), and the Court granted the stipulation (ECF No. 13);

WHEREAS, the parties jointly stipulated to further continue the hearing to February 18, 2021 (ECF No. 14), and the Court granted the stipulation (ECF No. 15); and

WHEREAS, the parties jointly stipulated to further continue the hearing to April 15, 2021 (ECF No. 16), and the Court granted the stipulation (ECF No. 17); and

WHEREFORE, the parties' counsel have discussed, and continue to discuss, potential early alternative dispute resolution in this case and a further continuance of the hearing date is necessary to facilitate these settlement discussions—specifically, the parties have each made and discussed proposals to resolve the parties' dispute and, most recently, continue to discuss and consider counter-proposals; and

NOW, THEREFORE, the parties agree and stipulate that:

Defendants' pending motion to dismiss (ECF No. 6), currently scheduled to be heard before this Court on April 15, 2021, shall be CONTINUED to April 29, 2021, at 2:00 p.m.

IT IS SO STIPULATED.

Dated: March 26, 2021

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

/s/ *Mark E. Merin*

By: _____

Attorney for Plaintiffs
HOFFMAN BROTHERS HARVESTING, INC.,
PAUL D. HOFFMAN & SONS, RONALD E.
HOFFMAN, and CARL R. HOFFMAN

1 Dated: March 26, 2021

Respectfully Submitted,
COLE HUBER LLP

2
3 /s/ *Derek P. Cole*
4 (as authorized on March 26, 2021)

5 By: _____
6 Derek P. Cole
7 Ronald J. Scholar

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12 Attorneys for Defendants
13 COUNTY OF SAN JOAQUIN,
14 DAVID KWONG, and JUANITA M. HUERTA

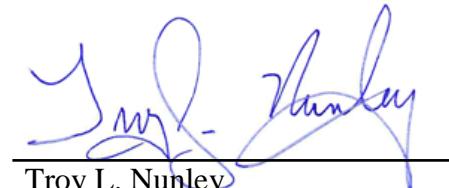
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ORDER

19 GOOD CAUSE APPEARING, the parties' stipulation is GRANTED.

20 Defendants' pending motion to dismiss (ECF No. 6), currently scheduled to be heard before this
21 Court on April 15, 2021, shall be CONTINUED to April 29, 2021, at 2:00 p.m.

22 IT IS SO ORDERED.

23 Dated: March 31, 2021



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Troy L. Nunley
United States District Judge